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PUBLIC UTILITIES  
COMMISSION

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF HAWAII

In the Matter of	) DOCKET 2009-0108
PUBLIC UTILITIES COMMISSION	)
Instituting a Proceeding to	)
Investigate Proposed Amendments	)
To the Framework for Integrated	)
<u>Resource Planning.</u>	)

LIFE OF THE LAND'S  
FINAL STATEMENT OF POSITION  
  
&  
CERTIFICATE OF SERVICE

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Aloha Commissioners,

The Public Utilities Commission opened Docket No. 2009-0108 to examine whether the Integrated Resource Planning ("IRP") Framework needs to be updated and whether the approach should be renamed Clean Energy Scenario Planning ("CESP"). The issues in the docket are:

1. What are the objectives of CESP and how do they differ from the objectives of IRP?
2. What is the basis for each of the proposed changes to the IRP process, and are these changes reasonable and in the public interest?
3. Whether the proposed changes to the IRP process should include changes to reflect difference between electric cooperatives and investor owned utilities?
4. What should be the role of the state's public benefits fee administrator?

Life of the Land participated in several ad hoc discussions with several parties in this docket regarding proposed modifications to the existing IRP Framework. The ad hoc group has produced a "Joint Proposed Framework", dated December 19, 2009, which is attached to the Final Statement of Position (FSOP) submitted by Haiku Design Analysis (HDA).

Life of the Land contributed to the Joint Proposed Framework and supports most but not all of its provisions. Life of the Land supports HDA's FSOP and herein joins that filing. Life of the Land also joins HDA on their Comments to NRRI.

Life of the Land's position on the issues in this docket should not be considered final. Life of the Land looks forward to further discussion with the parties before, during and after the upcoming panel hearings.

*Life of the Land continues to be concerned about various issues found in the various proposed Frameworks.*

(1) We believe Clean Energy should be defined as energy which minimizes the average greenhouse gas emissions per kilowatt-hour of electricity produced using lifecycle analysis to account for all cradle-to-grave emissions.

(2) We believe that the State of Hawai'i is a "Renewable Energy Zone." Hawai'i is blessed with deep cold oceans, trade winds, waves, sun, etc. We do not support the use of the term "Renewable Energy Zone" to designate specific areas that would serve particular groups at the expense of the general public.

(3) We are concerned with what a scenario is, what a reasonable number of scenarios will be, how they are picked, and whether they allow for a true analysis of the major energy questions confronting Hawai'i including, but not limited to, (a) whether or not to build an inter-island cable; (b) whether or not to promote the use of biofuels; (c) how to account for *greenhouse gas* emissions; (d) whether to focus on distributed generation or centralized generation; (e) how to incorporate fossil fuel volatility into the model; etc.

## The Issues

Issue #1: What are the objectives of CESP and how do they differ from the objectives of IRP?

The general purpose of the existing IRP Framework and any updated framework remains the same. Between the end of IRP and the start of CESP is a period when the Commission has opened, and must rule on, a series of transformative dockets as part of the largest and most complex energy transformation in the history of Hawai'i. These dockets are being submitted piecemeal, without any opportunity to examine them as a whole. As a result, we may be going down the wrong path without a map.

Issue # 2: What is the basis for each of the proposed changes to the IRP process, and are these changes reasonable and in the public interest?

Life of the Land supports HDA's FSOP.

Issue # 3: Whether the proposed changes to the IRP process should include changes to reflect differences between electric cooperatives and investor owned utilities?

There seems to be a broad consensus that the IRP Framework provisions need to cover all electric utilities. The plan should also include The Gas Company.

Issue # 4: What should be the role of the state's public benefits fee administrator ("PBFA")?

The PBFA and the utilities cover two sides of the same coin: energy delivery. Both should be part of the IRP/CESP process.

CERTIFICATE OF SERVICE

*I (we) hereby certify that the foregoing document was duly served on the following Parties and Participant, as set forth below: the Original and four copies hand delivered to the Public Utilities Commission, one copy hand delivered to the Division of Consumer Advocacy, one copy mailed to DBEDT and electronic copies to all entities listed below*

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December 21, 2009

A handwritten signature in cursive script that reads "Henry Q. Curtis". The signature is written in dark ink and is positioned above a horizontal line.

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Vice President for Consumer Issues